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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BEVERLY ADKINS, CHARMAINE WILLIAMS,
REBECCA PETTWAY, RUBBIE McCOY,
WILLIAM YOUNG, on behalf of themselves and all
others similarly situated, and MICHIGAN LEGAL
SERVICES,

Plaintiffs,

1:12-cv-7667-HB

v.

MORGAN STANLEY, MORGAN STANLEY &
CO. LLC, MORGAN STANLEY ABS CAPITAL I
INC., MORGAN STANLEY MORTGAGE
CAPITAL INC., and MORGAN STANLEY
MORTGAGE CAPITAL HOLDINGS LLC,

Defendants.

STIPULATION AND PROPOSED ORDER FOR ADOPTION OF REVISED
SCHEDULING ORDER

WHEREAS, on December 20, 2013 the Parties conferred with the Court via
teleconference regarding the Scheduling Order adopted by the Court on August 21, 2013;

WHEREAS, the Parties advised the Court that they believe a modest extension of the
schedule in this case is necessary and discussed with the Court the general outlines of a proposed
revised schedule, including a trial date;

WHEREAS, the Court invited the parties to submit the revised schedule they are
proposing to the Court in the form of a proposed order for the Court's consideration;

WHEREAS, the Parties have conferred and reached agreement on the proposed schedule
set forth below;

IT IS HEREBY STIPULATED AND AGREED by the Parties, and it is ORDERED by the Court, that the Scheduling Order shall be modified as follows:

Event	Current Date	Proposed Date
Last day to complete pre-class certification, non-expert discovery	January 27, 2014	April 4, 2014
Plaintiffs' motion for class certification and disclosure of expert witnesses due	March 25, 2014	May 13, 2014
Plaintiffs to make experts and declarants not previously identified as potential witnesses available for deposition	By April 24, 2014, provided that Defendants may elect to take any depositions through June 9, 2014	By June 4, 2014, provided that Defendants may take depositions up to July 28, 2014
Defendants' opposition to class certification and disclosures of expert witnesses due	June 9, 2014	July 28, 2014
Defendants to make experts and declarants not previously identified as potential witnesses available for deposition	By July 9, 2014, provided that Plaintiffs may elect to take any depositions through July 24, 2014	By August 18, 2014, provided that Plaintiffs may take depositions up to September 11, 2014
Plaintiffs' reply in support of class certification due	July 24, 2014	September 11, 2014
Oral argument on class certification	Not set	To be determined by the Court
Conference among counsel regarding any necessary additional merits discovery and procedural steps ¹	Not set	Within two weeks of a decision on class certification
Status conference to resolve any issues regarding additional merits discovery and procedural steps	Not set	Within three weeks after a decision on class certification
Last day for briefing of summary judgment motions to be completed	3 months before trial ready date	December 1, 2014

¹ Within two weeks of the Court's decision on the motion for class certification, the parties will confer about the following issues: (1) any remaining necessary merits discovery, (2) any further expert discovery and deadlines for any such disclosures and discovery, and (3) procedures to govern the remainder of the matter.

Date: 12/20/13

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Endorsement:

I've signed the Stipulation but to tighten the schedule for your benefit and mine we will have oral argument on class cert motion last week in August and fully briefed summary judgment motions (assuming certification) no later than October 15 and plan for trial in December - this is all tentative unlike your schedule but this is or will be a 3 year old case under your schedule and that's not my choice - if it turns out I have a choice. Let's plan on pre trial conference either the day before or preferably directly following oral argument on class cert motion and see where we are.